

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiff

vs.

AGENTRA, LLC

Defendant.

Case No. 18-cv-615-RCM

**DEFENDANT'S RESPONSES TO
PLAINTIFF'S SECOND SET OF DISCOVERY REQUESTS**

Pursuant to Fed. R. Civ. P. 33 and 34, Defendant Agentra, LLC ("Defendant") serves the following responses to discovery on Plaintiff Stewart Abramson ("Plaintiff"):

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

Request No. 1: All documents regarding to Angelic Marketing Group L.L.C.
("Angelic") or Matthew Jones.

Response: Defendant will produce non-privileged documents responsive to this request.

Request No. 2: Documents that identify any Agentra agents that hired Angelic or
Matthew Jones.

Response: Defendant will produce non-privileged documents responsive to this request.

Request No. 3: All contracts and correspondence regarding Angelic or Matthew Jones
over the course of the putative class period.

Response: Defendant will produce non-privileged documents responsive to this request.

Request No. 4: Documents that identify all leads or potential customers that came from Angelic or Matthew Jones to Agentra agents over the course of the putative class period.

Response: Defendant will produce non-privileged documents responsive to this request.

Request No. 5: Documents that identify all sales or customers that came from Agentra agents that were first called by Angelic or Matthew Jones over the course of the putative class period. If you are unable to provide that information, provide all sales or customers that came from Agentra agents who hired Angelic or Matthew Jones over the course of the putative class period.

Response: Defendant will produce non-privileged documents responsive to this request.

Request No. 7: All documents reflecting payments exchanged between Defendant, or any of its agents, and Angelic or Matthew Jones during the putative class period.

Response: Defendant will produce non-privileged documents responsive to this request.

Dated: April 29, 2019

/s/ William S. Richmond

William S. Richmond
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CERTIFICATE OF SERVICE

I, hereby certify that on April 29, 2019, I served the foregoing on all counsel of record via email, including but not limited to Anthony Paronich as lead counsel for Plaintiff.

/s/ William S. Richmond

William S. Richmond